

1 JULIAN L. ANDRÉ (SBN 251120)  
jandre@mwe.com  
2 **MCDERMOTT WILL & EMERY LLP**  
2049 Century Park East  
3 Suite 3200  
4 Los Angeles, CA 90067-3206  
Telephone: +1 310 277 4110  
Facsimile: +1 310 277 4730

5 JOSEPH B. EVANS (appearing *pro hac vice*)  
jbevans@mwe.com  
6 TODD HARRISON (appearing *pro hac vice*)  
tdharrison@mwe.com  
7 **MCDERMOTT WILL & EMERY LLP**  
8 One Vanderbilt Ave  
New York, NY 10017  
9 Telephone: (212) 547-5767  
Facsimile: (212) 547-5444

10  
11 Attorneys for Plaintiff  
12 TAYLOR THOMSON

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 Taylor Thomson

Case No. 2:23-cv-04669-MEMF-MAR

16 Plaintiff,

**PLAINTIFF TAYLOR THOMSON'S  
NOTICE OF MOTION AND MOTION TO  
DISMISS DEFENDANT ASHLEY  
RICHARDSON'S AMENDED  
COUNTERCLAIMS**

17 v.

18 Persistence Technologies BVI Pte Ltd., Tushar  
Aggarwal, Ashley Richardson,

The Honorable Maame Ewusi-Mensah  
Frimpong, United States District Judge

19 Defendants.

Date: May 30, 2024

20 Time: 10:00 a.m.

21 Courtroom: 8B

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1 NOTICE IS HEREBY GIVEN that on May 30, 2024, at 10:00 a.m., or as soon thereafter as  
2 the Court is available, before the Honorable Maame Ewusi-Mensah Frimpong, in Courtroom 8B of  
3 the United States District Court, Central District of California, located at 350 West First Street, 8<sup>th</sup>  
4 Floor, Los Angeles, California 90012, Plaintiff Taylor Thomson (“Plaintiff”) will and hereby does  
5 move the Court pursuant to Federal Rules of Civil Procedure 8(a) and 12(b)(6), to dismiss Defendant  
6 Ashley Richardson’s (“Defendant”) Amended Counterclaims.

7 This Motion is based on this Notice of Motion, the accompanying Memorandum of Points  
8 and Authorities, the pleadings, records, and files in this action, any reply memoranda or additional  
9 briefing on this subject, the attached proposed order, and on such further oral and written matters as  
10 the Plaintiff may present at or before the hearing on this matter.

11 For the reasons stated above and set forth in the accompanying Memorandum of Points and  
12 Authorities, Plaintiff respectfully requests that the Court dismiss the Defendant’s amended  
13 counterclaims in their entirety with prejudice.

14 This Motion is made following the conference of counsel of Plaintiff and the Defendant,  
15 which occurred via videoconference on February 14, 2024. Counsel for Plaintiff attempted to contact  
16 Defendant on February 9, 2024, but did not receive a response until some days later.

17  
18 Dated: February 16, 2024

**MCDERMOTT WILL & EMERY LLP**

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21 By: /s/ Julian L. André  
JULIAN L. ANDRE

22  
23 Attorneys for Plaintiff  
TAYLOR THOMSON

1 **PROOF OF SERVICE**

2 I am a citizen of the United States and resident of the State of California. I am employed  
3 in Los Angeles, California. My business address is McDermott Will & Emery, LLP, 2049 Century  
4 Park East, Suite 3200, Los Angeles, CA 90067. I am over the age of eighteen years and not a party  
5 to this action.

6 On February 16, 2024, I served unredacted copies of the following document:

7 **PLAINTIFF TAYLOR THOMSON'S NOTICE OF MOTION AND MOTION TO DISMISS  
8 DEFENDANT ASHLEY RICHARDSON'S AMENDED COUNTERCLAIMS**

9 on the following party via Electronic Mail based on the written consent of Ms. Richardson:

10 Ashley Richardson  
11 25399 Markham Lane  
12 Salinas, CA 93908  
ashrichardson@mac.com

*Defendant in Pro Per*

13 on the following parties via the CM/ECF Notice system:

14 AnnaMarie A. Van Hoesen  
15 AVanHoesen@jenner.com  
16 515 Flower Street, Suite 3300  
Los Angeles, CA 90071

*Counsel for Defendants Persistence  
Technologies (BVI) PTE. Ltd. and  
Tushar Aggarwal*

17 Kayvan B. Sadeghi  
18 ksdadeghi@jenner.com  
19 Adina Hemley-Bronstein  
AHemley-Bronstein@jenner.com  
1155 Avenue of the Americas  
20 New York, NY 10036

21 I declare under penalty of perjury under the laws of the United States that the foregoing is  
22 true and correct. Executed on February 16, 2024 in Los Angeles, California.  
23

24 /s/ Diksha Vadan  
Diksha Vadan  
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